

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

No. 5:21 -CR-00259-D-1

UNITED STATES OF AMERICA

v.

ANITA LOUISE JACKSON

) **NOTICE OF EX PARTE MOTION,**
) **AND EX PARTE MOTION FOR**
) **COURT APPROVAL TO TRAVEL**
) **OUTSIDE OF THE UNITED STATES**
) **TO THE BAHAMAS**
)
) **DATE: AUGUST 2, 2021**
) **TIME: 9:00 AM**
) **HON. JAMES E. GATES**

NOTICE OF EX PARTE MOTION

TO THE UNITED STATES AND THEIR ATTORNEYS OF RECORDS, PLEASE TAKE NOTICE that DR. ANITA LOUISE JACKSON, does move this Court for an order approving her to travel to the Bahamas. Dr. Jackson has notified her Probation Officer, Officer Marissa Anthony, via email stating: “My boys are scheduled to continue their golf journey and play in the Bahamas in August to prepare for their Tour Championship on August 14th. I am requesting to get my passport for this upcoming trip and return it to you upon my return on August 11th.”

Dr. Jackson has complied with all the terms and conditions of her release and will continue to so comply. This motion is based on all the documents on file in this matter, including the Orders set forth in the attached TRANSCRIPT OF INITIAL APPEARANCE BEFORE THE HONORABLE JAMES E. GATES THURSDAY, JUNE 24, 2021.

INTRODUCTION

COMES NOW Defendant, Dr. Anita Louise Jackson, respectfully submits this EX PARTE MOTION FOR COURT APPROVAL TO TRAVEL OUTSIDE OF THE UNITED

STATES TO THE BAHAMAS based on this Court's Order for Conditions of Release as reflected in the attached excerpts of TRANSCRIPT OF INITIAL APPEARANCE BEFORE THE HONORABLE JAMES E. GATES THURSDAY, JUNE 24, 2021. **See Exhibit 1.**

Dr. Jackson has notified her Probation Officer, Officer Marissa Anthony, via email stating: "Request for my passport on Monday August 2nd to return August 11th- My boys are scheduled to continue their golf journey and play in the Bahamas in August to prepare for their Tour Championship on August 14th. I am requesting to get my passport for this upcoming trip and return it to you upon my return on August 11th." Dr. Jackson hereby requests this Court to issue an Order directing the Probation Department to release her passport, allowing her to travel to the Bahamas for her family travels.

EX PARTE MOTION

As is reflected in the Transcript of Initial Appearance, This Honorable Court imposed the following terms and conditions of release on Dr. Jackson, stated in pertinent parts: "You must surrender any passport to the U. S. Probation. Office subject to return to the defendant with court approval...In addition, you must abide by the following restrictions on ... travel. And I am limiting you... "The defendant shall not travel outside of the United States without court approval." So if you need to travel out of the United States, you need to get court approval and you can obviously work with your lawyer on that. So what that means is the way this would work in practice is if you need to travel outside the country, I imagine a motion would be accompanied by an itinerary. The Court's likely, I mean, I don't want to prejudge, but assume the Court approves it, then the Court would direct Probation to return your passport to you so you could travel and then I assume that order would say once you get back you need to return your passport to Probation and however

time, many times you travel, that would be the, the procedure, as I envision it.” TIA: 53:21-25; 54:1-17

Dr. Jackson has notified her Probation Officer, Officer Marissa Anthony, via email stating: “Request for my passport on Monday August 2nd to return August 11th- My boys are scheduled to continue their golf journey and play in the Bahamas in August to prepare for their Tour Championship on August 14th. I am requesting to get my passport for this upcoming trip and return it to you upon my return on August 11th.” with her Delta Flight Itinerary attached. **See Exhibit 2. Exhibit 3** reflects her Hyatt Hotel Reservation.

During the Initial Appearance Hearing, Dr. Jackson’s attorney apprised the Court of her minor sons’ occasional travels for golf tournaments: “MR. BONNER: Your Honor, She has two young minor children, one 6 and one 10 years old, and they are golfers. They’re like Little League.... they win awards playing golf and they travel for their particular tournaments.” **Exhibit 1-TIA: 34:2-15.** Dr. Jackson’s minor sons’, A.J.J. and C.C.J., airline tickets are attached as **Exhibit 4.**

CONCLUSION

Dr. Jackson respectfully requests this Honorable Court to issue an Order directing the Probation Department to release her Passport, permitting her to travel to the Bahamas on Monday August 2nd to return August 11th. She will surrender her passport to the Probation Officer immediately following her return on August 11th.

Respectfully submitted this 30th day of July, 2021.

/s/Charles A. Bonner
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that a copy of the foregoing pleadings or papers were served on the registered parties through the Court's Electronic Filing notification process.

This 30th day of July, 2021.

/s/Charles A. Bonner
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